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BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Ex Parte No. 582

PUBLIC VIEWS ON MAJOR RAIL CONSOLIDATIONS



**UNION PACIFIC'S PETITION TO
FILE CONSOLIDATED RESPONSE
TO STAY PETITIONS OF BNSF AND CN**

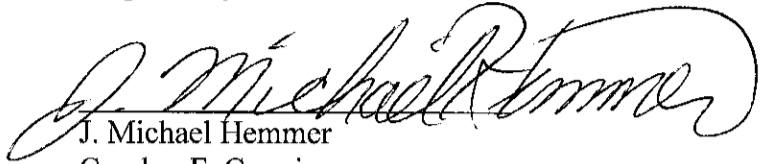
Pursuant to 49 C.F.R. § 1117.1, Union Pacific Corporation and Union Pacific Railroad Company (collectively, "UP") hereby petition the Board to allow UP to file a consolidated response to the Petitions for Stay Pending Judicial Review filed by Burlington Northern Santa Fe Corporation and Burlington Northern and Santa Fe Railway (collectively, "BNSF") on March 20, 2000, and by Canadian National Railway Company ("CN") on March 22, 2000.

Instead of filing two separate 10-page responses, as permitted under the Board's rules, UP proposes to file a single response of less than 20 pages. UP submits that filing a shorter, consolidated response will avoid duplication in UP's argument and save time for readers. Filing a single, consolidated response will not prejudice BNSF or CN in any manner. Counsel for BNSF and CN have consented to UP's request.

Accordingly, UP requests that the Board permit it to file the accompanying consolidated reply.

Respectfully submitted,

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A handwritten signature in cursive script, reading "J. Michael Hemmer".

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